

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF PUERTO RICO**

EDWIN CALDERON TORRES *et al.*,

Plaintiff,

v.

SIG SAUER, INC.,

Defendant.

Civil Action No.  
3:24-cv-01441 (PAD)

**INFORMATIVE MOTION REGARDING DISCOVERY**

**TO THE HONORABLE COURT:**

**NOW COMES**, defendant, SIG SAUER, INC. ("SIG" or "Defendant") by its undersigned attorney, and very respectfully STATES and PRAYS as follows:

1. On March 12, 2025, SIG served on Plaintiff Edwin Calderon Torres the following requests, to be answered pursuant to the Rules: (1) Requests for Admissions; (2) Requests for the Production of Documents; and (3) First Set of Interrogatories.

2. Additionally, SIG noticed the deposition of Plaintiff Edwin Calderon Torres to take place on May 6, 2025, starting at 10:00 A.M. at the offices of Marichal Hernandez, LLC.

3. Furthermore, on February 12, 2025, SIG served: (1) a subpoena on the Puerto Rico Emergency System (911) for all emergency calls related to incident; (2) a subpoena on the Puerto Rico Emergency Medical System (ASEM) for all of plaintiff's medicals, which was referred to the Industrial Commission that is the institution where Plaintiff received treatment; and (3) a subpoena on the Puerto Rico Police Department ("PRPD") for his personnel file, administrative complaints.

4. On March 13, 2025, SIG has also served subpoena on the PRPD for inspection of the subject Pistol and holsters for May 7, 2025, at the PRPD, as well for the production of all reports and investigations related to the incident.

5. Finally, on March 11, 2025, and March 13, 2025, respectively, SIG also sent a preservation letter to the PRPD and to counsel for Plaintiffs to have the subject pistol and holster seized and stored for preservation for discovery and trial.

6. As of today, Plaintiff has not served any discovery upon SIG.

**WHEREFORE**, SIG SAUER, Inc., respectfully requests that this Honorable Court takes notice of the discovery it has served.

**RESPECTFULLY SUBMITTED**, In San Juan, Puerto Rico, on March 14, 2025.

**WE HEREBY CERTIFY** that, on this same date, we electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send a notification to all counsel of record, all CM/ECF participants in the case.

**Littleton, Joyce Ughetta & Kelly, LLP**

4 Manhattanville Road, Suite 202  
Purchase, NY 10577  
Tel. 914.417.3400  
Fax. 914.417.3401

**s/Brian Keith Gibson**

[keith.gibson@littletonjoyce.com](mailto:keith.gibson@littletonjoyce.com)

**Littleton, Joyce Ughetta & Kelly, LLP**

201 King of Prussia Road, Suite 220  
Radnor, PA 19087  
Tel. 484-254-6220  
Fax. 484-254-6221

**s/Kristen E. Dennison**

[kristen.dennison@littletonjoyce.com](mailto:kristen.dennison@littletonjoyce.com)

**Marichal Hernández LLC**

1510 Ave FD Roosevelt, Suite 9B1  
Guaynabo, PR 00968-2620  
PO Box 190095  
San Juan, PR 00919-0095  
Tel 787.753.1565  
Fax 787.763.1704

**s/Miguel A. Rangel Rosas**

USDC Bar No.: 218601  
[mrangel@mhlex.com](mailto:mrangel@mhlex.com)

**Coto & Associates**

Counsel for SIG SAUER, INC.  
Suite 800  
255 Ponce de Leon Ave.  
San Juan, PR 00917  
Po Box 71449  
San Juan, PR 00936-8549  
Phone: 787-756-9640  
Fax: 787-756-9641

**s/Ramón Coto-Ojeda**

Ramon Coto-Ojeda, Esq.  
USDC-PR No. 202006  
[rco@crlawpr.com](mailto:rco@crlawpr.com)